

THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH
CAROLINA WESTERN DIVISION

No. 5:21-CV-00225-BO

JUDITH KNECHTGES,

Plaintiff,

v.

NC DEPARTMENT OF PUBLIC
SAFETY, et al.,

Defendants.

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**DEFENDANTS' MOTION TO
DISQUALIFY COUNSEL**

NOW COMES Defendants, NC Department of Public Safety, Eric Hooks, Janet Thomas and Terri Catlett ("Defendants") through undersigned counsel pursuant to Rules 1.9 and 3.7 of the North Carolina Rules of Professional Conduct, Rule 7(b) of the North Carolina Rules of Civil Procedure, and the inherent power of the Court and respectfully move the Court for an order disqualifying the New South Law Firm and attorney Valerie Bateman from representing Plaintiff, Judith Knechtges in the above-captioned matter. Defendants also moves to stay this matter until the court has ruled on this motion and to allow Plaintiff time to find a new attorney.

In support of this Motion, Defendants rely on their Memorandum of Law in Support of this Motion, and exhibits thereto, certain of which Defendants are seeking to file under seal because they contain certain confidential information.

This the 18th day of November, 2022.

JOSHUA H. STEIN

ATTORNEY GENERAL

/s/ Bryan G. Nichols
Bryan G. Nichols
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CERTIFICATE OF SERVICE

I hereby certify that, on this date, I electronically filed the foregoing Motion with the Clerk of the Court utilizing the CM/ECF system:

Valerie Bateman
New South Law Firm, P.C.
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Carrboro, NC 27510
valerie@newsouthlawfirm.com

This the 18th day of November, 2022.

/s/ Bryan G. Nichols
Bryan G. Nichols
Assistant Attorney General